

# EMERGENCY PLAN and BEST MANAGEMENT PRACTICES



## International Salt Company Curtis Bay Site

1501 East Patapsco Avenue, Baltimore, MD 21226 - 1101  
Phone (410) 355 - 5850

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Company	Personnel	Job Title	Office Phone	Mobile Phone
International Salt Company	Nicholas Miraglio	Operations Manager	570.319.3137	570.575.7461
R W Seal, Inc.	Robert Seal	President	410.549.1010	410.409.1104
CSX	Rick McNey	Manager of Maintenance	410.355.6309	RNX 465.6309

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### ***FIRE EMERGENCY***



**911 or 410.396.9350**

### ***MEDICAL EMERGENCY***



**911 or 410.609.2156**

### ***SPILL EMERGENCY***



**866.633.4686**

NATIONAL RESPONSE CENTER  
US COAST GUARD - 24 HOUR  
EPA REGION III - 24 HOUR

**800.424.8802**  
**301.596.6946**  
**215.814.5000**

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Prepared for:  
**International Salt Company**  
**Curtis Bay Site**  
**1501 East Patapsco Avenue**  
**Baltimore, MD 21226-1101**  
**Phone: (410) 355-5850; Fax: (410) 000 - 0000**

Prepared By:



**TRITON ENVIRONMENTAL, INC.**  
*Environmental Consulting & Engineering*

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**TRITON ENVIRONMENTAL, INC.**  
Environmental Consulting & Engineering

FIGURE 1  
SITE LOCATION MAP

INTERNATIONAL SALT COMPANY  
1501 EAST PATAPSCO AVENUE  
BALTIMORE, MARYLAND



## INTRODUCTION and FACILITY OVERVIEW

International Salt Company (ISCO) operates a bulk salt storage terminal at 1501 East Patapsco Avenue in Baltimore, Maryland. The subject site is an approximately 5-acre property owned by CSX and leased to ISCO. The property is located at the intersection of East Patapsco Avenue and Shell Road and is approximately 200 feet from a portion of Baltimore Harbor identified as Curtis Bay. The facility is shown on the Site Location Map (page ii).

The primary activities at this facility include the receipt, storage, and distribution of bulk road salt (de-icing salt). A site use identifier (COM2004-03567) was issued to CSX for “storage of roadway salt” from the City of Baltimore Department of Housing and Community Development. ISCO has determined that its operations conform to the zoning use and understands that CSX will continue to maintain the site with the referenced identifier.

Salt is received by marine vessel at a nearby property owned by CSX. The off-loaded material is transported to the site for distribution to customers such as the Department of Transportation (DOT), municipalities, and retailers. The site operations are supported by a limited number of dump trucks, front loaders, and bulldozers. Storage of materials at the site is limited to bulk salt and diesel stored in a portable 275-gallon tank.

This Emergency and Best Management Practices (BMP’s) manual has been developed for the site to be used as a guide to respond to a range of emergencies that might occur during routine operations. These emergencies could include actions to respond to a fire, medical emergency, or response to a release of hazardous materials stored at the site. In addition, the manual has been prepared to document the management practices (BMPs) that have been developed to reduce the potential impact to the environment from the routine storage of salt or other materials at the site.

## FACILITY INFORMATION INTERNATIONAL SALT CURTIS BAY SITE-BALTIMORE, MD

Facility Name:	International Salt - Curtis Bay Site		
Operator Name:	International Salt		
Location (Street Address):	1501 East Patapsco Avenue		
City: Baltimore	State: MD	Zip: 21226 – 1101	
County: Baltimore		Phone Number:	410.355.6302
		Fax Number:	410.355.2088
Latitude:	39 Degrees:	13 Minutes:	60 Seconds: N
Longitude:	76 Degrees:	35 Minutes:	04 Seconds: W
SIC Code:	5169		
Wellhead Protection Area:	None		
Owner/Corporate Office:	International Salt Company		
	City: Clark Summit	State: PA	Zip: 18411
	Phone Number: 888.388.4726		

**Current Operation:** The facility is equipped to receive, store, and distribute salt products (de-icing salt). Products are primarily received from off-loaded vessels, stored on-site, and then distributed by trucks to customers such as the DOT, municipalities, and retailers.

## EMERGENCY NOTIFICATION PHONE LIST FIRST CONTACT

Nicholas Miraglio International Salt Company Operations Manager, Central Region 655 Northern Boulevard, Ste 1 Clark Summit, PA 18411 Work Phone: 570.319.3137 Mobile Phone: 570.575.7461	Robert Seal R W Seal, Inc. President  4997 Winchester Boulevard Frederick, MD 21703 Work Phone: 410.549.1010 Mobile Phone: 410.409.1104	Rick McNey CSX Manager of Maintenance  1910 Benhill Ave. Baltimore, MD 21226 Work Phone: 410.355.6309 Mobile Phone: RNX 355.6309
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## EMERGENCY RESPONSE CONTACTS

Fire Emergency	911 or 410.396.9350
Fire Marshall	410.764.4324 day/eve.
Police Emergency	911 or 410.396.2525
Hospitals:	
Harbor Hospital	410.350.3200
Johns Hopkins Hospital	410.955.5080
Mercy Medical Center	410.332.9000
Emergency Response Contractor	
National Response Center	800.424.8802
Regional Response Center (EPA REGION III)	215.814.5000
Department of the Interior (DOI)	617.223.8565
National Oceanographic Atmospheric Admin. (NOAA)	202.267.1321
US Coast Guard 24-hour Response	301.596.6946
MDE 24-hour Spill Response	866.633.4686
LEPC	410.396.6187

## SPILL RESPONSE CONTRACTORS

Clean Harbors Environmental	800.645.8265
Hepaco Inc.	800.888.7689
The Vane Brothers Company	410.631.5096

## NEIGHBORING FACILITIES

CSX	410.355.6309
PCS Facility (Operated by Savage Industries)	410.355.9919
SGS North America	410.355.1958
McCreath & Sons Testing	410.355.4300

## OTHER IMPORTANT NUMBERS

Radio Station (WBAL)	410.685.4079
Television Station WBFF (Channel 45)	410.467.4545
Water Department	410.887.3900
Weather Station	410.267.5660
Exact Enterprises Inc. (Emergency Service Helicopter)	301.592.0080

# Emergency First Response Actions



## FIRE EMERGENCY INFORMATION

### *First Response Actions*

- Don't Panic!
- Notify Manager and Call Fire Department.
- Identify products on fire or in danger of igniting.
- Extinguish fire if possible using appropriate equipment; evacuate if necessary.
- All land-based equipment should enter the Site from East Patapsco Avenue.
- All water-bound equipment should arrive from the Baltimore Harbor.

**CALL                      Fire Department                      911 or 410.396.9350**



## MEDICAL EMERGENCY INFORMATION

### *First Response Actions*

- Don't Panic!
- Provide first aid if qualified. Do not move unless life is in danger.
- Determine the cause of the incident and determine additional equipment or assistance which will be required.
- Notify Manager and Call Ambulance
- If a chemical is involved, locate and review the MSDS or call Chemtrec: 800.424.9300
- Identify someone to meet the Ambulance
- Injured personnel will be transported by local ambulance company to the nearest available hospital.

**CALL                      Ambulance                      911 or 410.609.2156**



## POLICE EMERGENCY INFORMATION

### *First Response Actions*

- Notify Manager and Call Police for assistance or traffic control.

**CALL                      Police                      911 or 410.396.2525**



## **SPILL RESPONSE - IMMEDIATE ACTIONS**

### ***International Salt, Curtis Bay Site***



Based on an evaluation of site operations, the materials identified at the site subject to spill response actions include diesel stored in a 275-gallon aboveground storage tank and potential motor/hydraulic oil releases. In the case of releases from these sources, the following actions should be taken. Spill response material and equipment maintained on-site are identified below.

1. Take all measures to stop outflow and secure area if such actions can be accomplished safely. If determined that product flow can not be stopped, a response contractor identified on page 2 of this plan should be called for assistance.
2. Immediately confine leaked material with sorbents, sand, or by other means if such actions can be accomplished safely. Equipment with a bucket attachment can be used to move stockpiled material to various locations for response action.
3. Immediately notify the Qualified Individual who will evaluate the event and determine whether further action and notification is required. Spills of hazardous material may be subject to notification requirements.
4. Contaminated soils and sorbent materials should be collected and contained for disposal. Treatment and Disposal should be conducted in accordance with appropriate Federal, State and Local regulations. These activities should be reported to Federal, State and Local authorities, as applicable.
5. A management official is responsible for filing a written follow-up report. All records regarding the spill and the response actions should be maintained on file.

### **SPILL RESPONSE MATERIALS/ EQUIPMENT**

<b>Item</b>	<b>Location</b>
Sorbents (Pads, socks, absorbent boom)	Spill Kit
PPE (Gloves, Safety Glasses, Tyvec Suit)	Spill Kit or Vehicle
Sand	Near Spill Kit
Loader	On-site
Shovel	Vehicle
Fire Extinguisher	Vehicle
Disposal Drum	Near Spill Kit



## **SPILL RESPONSE HEALTH AND SAFETY GUIDELINES**

*International Salt, Curtis Bay Site*



While other health and safety guidelines may be required for the site, the following guidelines are specific to spill response actions associated with hazardous materials identified in this plan. As noted above, response materials may be located in response materials maintained at the site or with contractors in their vehicles.

All personnel should be familiar with the Site Health and Safety Plan. Please refer to the Material Safety Data Sheets (MSDS) located in the Manager's office for additional guidelines on handling spilled materials.

- Anyone handling spilled material should wear appropriate personal protective equipment (PPE). Such protection may include:
  - Nitrile gloves, eye protection, hard hat; and
  - Protective suits or disposable coveralls where clothing contamination is likely to occur.
- Anyone who handles spilled material and gets a small amount of spilled material on their skin or clothing should decontaminate immediately, but no later than at the end of the work period/shift. Areas of gross contamination should be decontaminated immediately. Decontamination will include a shower where any significant contamination occurs.
- Equipment which comes in contact with spilled material should be cleaned before it leaves the site. Where it is not possible to completely clean equipment before it leaves the site, steps should be taken as needed to prevent the spread of spilled material. This equipment should be cleaned as soon as possible.
- All containers of spilled material should be labeled. The label should include the identity of the spilled material and appropriate hazard warnings.
- Anyone handling or likely to come in contact with the spilled material must review the MSDS for the spilled material. This review must take place prior to the employee handling or contacting the spilled material.
- If determined that site personnel are unable to control or respond appropriately to a release of material, a response contractor should be contacted. Clean-up contractors must be Hazwoper trained.



## HAZARDOUS MATERIALS QUICK REFERENCE SHEET

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### Combustible Liquid (Diesel, Motor Oil, or Hydraulic Oil)

(NA 1993)

#### Potential Hazard

- Fire & Explosion:
- May be ignited by Heat, Sparks, or Flames at elevated temperatures
- Reactivity:
- Incompatible with strong acids or oxidizing agents
- Health:
- May be Harmful or Fatal if Swallowed
  - Exposure to Vapors may cause Irritation and Unconsciousness
  - Contact may cause Skin, Eye, and Respiratory Irritation

#### Emergency Action

1. Clear the immediate area – Explosion is Possible! Shut off all Ignition Sources.
2. Use Dry Chemical, CO<sub>2</sub>, or Foam to extinguish fire.
3. Use Water to Keep Other Tanks and Buildings Cool. Evacuate the area if "rising sound" from venting device if tank becomes discolored due to fire.
4. Deploy boom or dike the area to contain a spill.



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### Sodium Chloride (De-icing Salt)

#### Potential Hazard

- Fire & Explosion:
- None
- Reactivity:
- Incompatible with lithium, bromine, trifluoride, strong acids & strong oxidizing agents
- Health:
- Contact with eyes may cause mild to moderate temporary irritation.;
  - Contact with abraded skin may cause a mild irritation or rash;
  - Inhalation of dust may cause nose, throat and respiratory tract irritation;
  - Ingestion of less than a few grams would not be harmful but large doses may cause vomiting.

#### Emergency Action

- Eye Contact:
- Flush with water for 15 minutes. If irritation persists, call a physician.
- Skin Contact:
- Wash with soap and water. Call a physician if irritation develops.
- Inhalation:
- None
- Ingestion:
- Ingesting large volumes may cause vomiting. Rinse mouth with water. If vomiting occurs naturally, have victim lean forward to reduce risk of aspiration. Call a physician.



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Notes: Taken from typical MSDSs.

## HAZARDOUS MATERIALS QUICK REFERENCE SHEET

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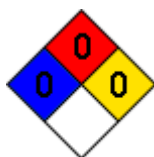
### **Ice B-Gone Liquid** (Magic – O, Distillers Soluble, M-50, Bare Ground, DCS)

#### Potential Hazard

- Fire & Explosion: • None
- Reactivity: • None
- Health: • Ingestion;  
• Very low toxicity, may cause slight irritation to eyes or skin

#### Emergency Action

- Eye Contact: • Flush eyes with water
- Skin Contact: • Remove from skin by wiping and washing thoroughly with water
- Inhalation: • None
- Ingestion: • If there is discomfort, give fluids and treat symptomatically



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Notes: Taken from typical MSDSs.



## DIRECTIONS TO AREA HOSPITALS



### ***Harbor Hospital-Baltimore, Maryland***

3001 South Hanover Street  
Baltimore, MD 21225

From Curtis Bay Site:

1. Depart E Patapsco Ave (0.0 mi)
2. Bear right onto Shell Rd (0.6 mi)
3. Keep straight onto Frankfurst Ave (1.0 mi)
4. Bear right onto S Hanover St (0.2 mi)
5. Keep straight onto SR-2 North / S Hanover St (0.6 mi)

### ***Mercy Medical Center-Baltimore, Maryland***

301 Saint Paul Street  
Baltimore, MD 21202

From Curtis Bay Site:

1. Depart E Patapsco Ave (0.0 mi)
2. Bear right onto Shell Rd (0.6 mi)
3. Keep straight onto Frankfurst Ave (1.0 mi)
4. Bear right onto S Hanover St (0.2 mi)
5. Keep straight onto SR-2 North / S Hanover St (1.7 mi)
6. Take ramp right for I-95 South toward Washington / Downtown (0.4 mi)
7. At exit 53, take ramp right for I-395 North toward Downtown / M L King Blvd (1.3 mi)
8. Keep straight onto S Howard St (0.4 mi)
9. Turn right onto W Baltimore St (0.2 mi)
10. Turn left onto N Charles St (0.1 mi)
11. Turn right onto E Lexington St (0.2 mi)
12. Turn left onto SR-2 North / N Calvert St (0.2 mi)
13. Turn left onto E Pleasant St (0.1 mi)
14. Turn left onto St Paul Pl (0.0 mi)

### ***Johns Hopkins Hospital-Baltimore, Maryland***

600 North Wolfe Street  
Baltimore, MD 21287

From Curtis Bay Site:

1. Depart E Patapsco Ave (0.0 mi)
2. Bear right onto Shell Rd (0.5 mi)
3. Take ramp right for I-895 North / Harbor Tunnel Throughway toward Toll Tunnel (4.0 mi)
4. At exit 11B, take ramp right and follow signs for O'Donnell St (0.3 mi)
5. Turn right onto O'Donnell St (0.3 mi)
6. Turn right onto Ponca St (0.4 mi)
7. Turn left onto Eastern Ave (2.1 mi)
8. Turn right onto S Broadway (0.1 mi)
9. Arrive at 401 S Broadway # 2335, Baltimore, MD (0.0 mi)

## **BEST MANAGEMENT PRACTICES (MEASURES AND CONTROLS)**

Activities at the subject facility include the receipt, storage, and distribution of bulk road salt (de-icing salt). The site and its associated activities operate in compliance with federal, state, county, and local requirements. Based on a review of operations, review of regulations, and communications with regulators, it is believed that ISCO has obtained the necessary approvals to operate the subject site. A summary of the findings from this review is presented below. While not specifically required by any permit or regulatory requirements, ISCO has voluntarily developed and implemented this plan and Best Management Practices (BMPs) presented below as a proactive measure to operate the site.

### **Regulatory Review**

#### *Federal (USEPA)/ State (MDE) Permits and Approvals*

The Maryland Department of the Environment (MDE) has authority to issue discharge permits as an authorized agency through the federal stormwater NPDES program (USEPA). MDE offers individual and general permits for stormwater discharges from industrial sites as part of this permit program. However, based on a review of the permit requirements and communications with MDE staff, it was determined that ISCO's operations are not subject to stormwater permitting. MDE has provided a permit determination letter to ISCO indicating that the site is not subject to stormwater permitting.

As the site is not subject to MDE's general permit or other stormwater permitting (e.g. EPA Multi-Sector General Permit (MSGP)), neither a Stormwater Pollution Prevention Plan (SWPPP) nor BMPs are required. As noted above, ISCO has developed the BMPs presented below as a proactive measure. These BMPs include many of the elements as required in SWPPPs for facilities that would be subject to stormwater permitting.

State wetland requirements were also evaluated as the regulations referenced permitting for aboveground storage tanks in flood plains. However, it was determined that a State Wetlands Permit would only be required when installing/constructing a new tank in a flood plain, not to operate an existing skid-mounted tank.

#### *County/ Local Permits and Approvals*

ISCO completed a review of county (Baltimore County) and local (City of Baltimore) regulatory requirements to evaluate whether permits or approvals were required for the site and associated operations. As part of this review, the agencies were contacted to verify the need for specific permits. The results from the review indicated that the "storage of roadway salt" has been registered and approved for the subject site, via CSX, with the City of Baltimore's Department of Housing and Community Development. While this activity is identified with CSX, it also applies to the operator of the site (ISCO) per communications with the City of Baltimore. As such, ISCO has determined that its operations conform to the approved use and understands that CSX will continue to maintain the status of the site as noted with the City of Baltimore.

### **Best Management Practices**

#### *Stockpile Covers/Salt Storage*

Following receipt of salt, the product is graded into a stockpile. The stockpile is constructed using a series of ramps to allow for deposition of salt on the top of the pile. Upon reaching its peak height, a

stage cover is placed on the stockpile, which will be added to as the stockpile is being built. Once the stockpile is full, it will be completely covered until such time as outbound shipments occur.

The stage cover will be anchored using ballast bags to create a uniform web, thus sealing the perimeter around the stockpile. The covered pile will be only opened along a “working face” as necessary to remove salt or in preparation to receive a replenishment supply.

### *Good Housekeeping*

Good housekeeping BMP's are used to maintain a clean and orderly work place to minimize the release of materials that could impact stormwater. Facility personnel are responsible for daily tasks associated with keeping a clean and safe working environment. Several of the good housekeeping BMP's are described below.

As salt is stockpiled during normal operations, clean-up of salt following the staging of interim piles using a front-end loader occurs routinely to return paved or other surfaces to a generally clean condition. Salt spilled during truck loading or transporting material from the site will be removed by the front-end loader or other methods and returned to the stockpiles as soon as possible.

If small spills of other materials occur during normal operations (e.g. minor spills of fuel), they are immediately removed using absorbent materials which are disposed of properly. Equipment or vehicles that are operating improperly (e.g. leaking fluids) are promptly repaired or taken out of service.

### *Sediment and Dust Control*

Salt received at the site typically has 0.3-0.5% moisture content. As such, there is minimal concern for air-borne mobilization of salt (dust) due to transfer points, loading vehicles, or wind.

The ISCO facility is paved and stormwater is directed to a treatment/settling basin to reduce the quantity of gross solids that may be mobilized from certain portions of the site. Treated stormwater is discharged from the basin to the harbor through a series of open channels and culverts. Structures associated with the collection and treatment system are checked for signs of deterioration.

As detailed above, a front-end loader is used to routinely maintain surfaces in a generally clean condition to minimize the potential for mobilizing salt in stormwater. In addition, stage covers are installed to minimize contact of stormwater with the product and minimize run-off.

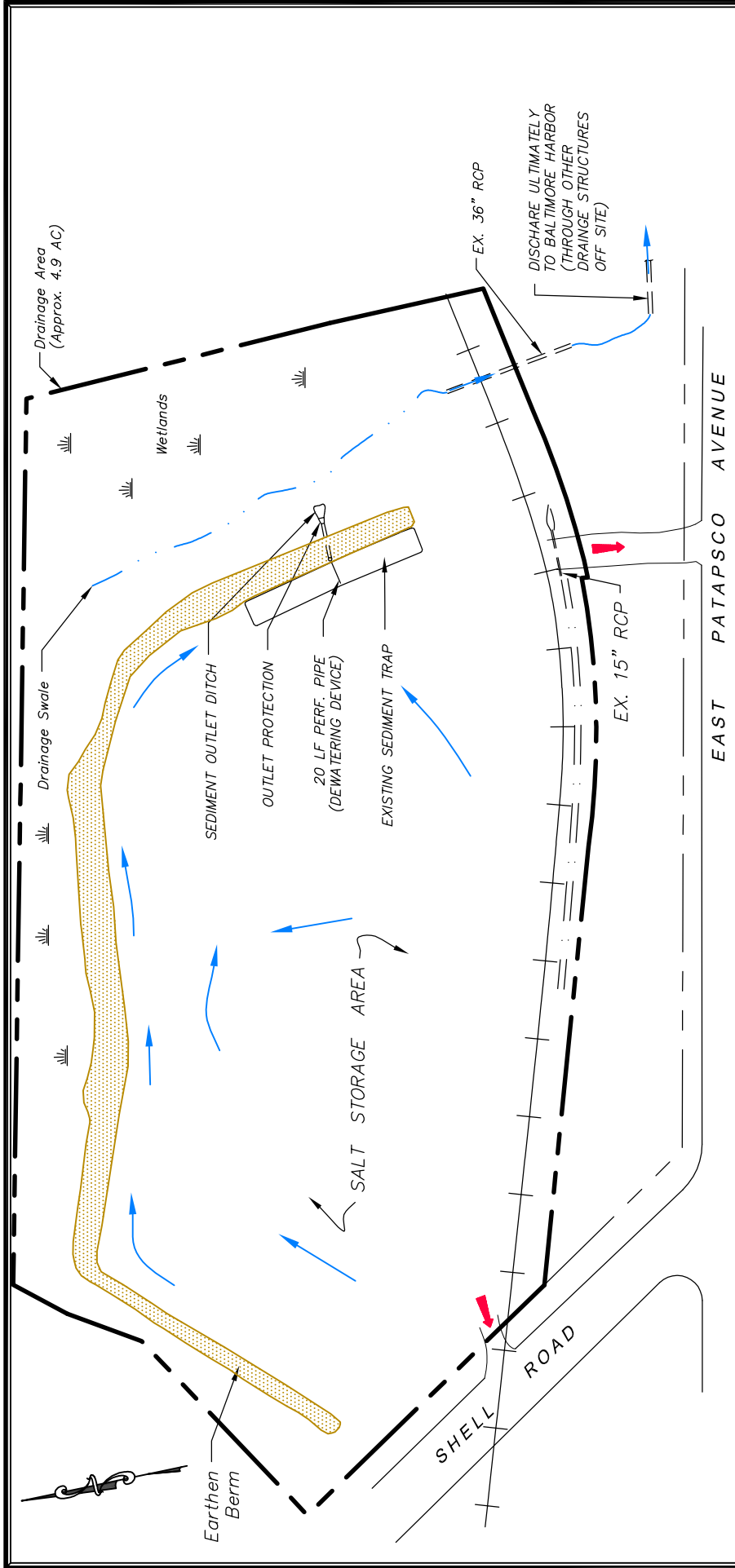
### *Preventative Maintenance*

Maintenance operations associated with the site vehicles are limited to keeping the equipment in serviceable conditions. Equipment and vehicles are regularly inspected for signs of wear or deterioration. If wear is identified, the items are repaired or replaced.

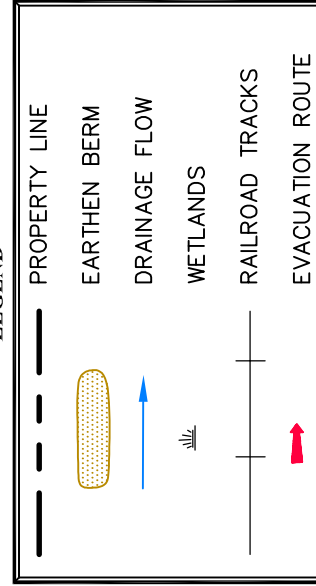
### *Inspections*

Informal inspections are part of normal facility operations.

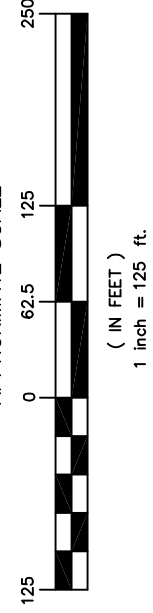




# LEGEND



## APPROXIMATE SCALE



EMERGENCY MUSTER AREA  
LOCATION AT CSX SITE

### NOTES:

1. THE LOCATION OF ALL STRUCTURES, EQUIPMENT, DELINEATIONS AND OTHER FEATURES PRESENTED ON THIS DRAWING SHOULD BE CONSIDERED APPROXIMATE. THIS DRAWING SHOULD ONLY BE USED FOR GENERAL PRESENTATION PURPOSES AND SHOULD NOT BE USED FOR CONSTRUCTION PURPOSES. TRITON MAKES NO WARRANTY AS TO THE CORRECTNESS OR THE COMPLETENESS OF THE INFORMATION CONTAINED IN THIS DRAWING, AND THE USER ASSUMES ALL RISK OF LOSS TO PERSONS AND PROPERTY FROM RELIANCE THEREON.
2. BASE MAP IS BASED ON A MAP ENTITLED "CSX ORE STORAGE YARD PERMANENT SEDIMENT CONTROL MEASURES" SCALE: 1"=30', DATE 9 JULY 1990 BY FARRAND & ENGLISH

**TRITON ENVIRONMENTAL, INC.**  
Environmental Consulting & Engineering

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### FIGURE 2

EMERGENCY PLAN AND  
BEST MANAGEMENT PRACTICES

INTERNATIONAL SALT COMPANY  
1501 EAST PATAPSCO AVENUE  
BALTIMORE, MARYLAND

DRAWN BY: MFG	APPROVED BY: PCS
DATE: 5/27/10	SCALE: 1"=125' FILE No.: 103653SP01